

Lexi J. Hazam (SBN 224457)  
*lhazam@lchb.com*  
LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Telephone: (415) 956-1000  
Facsimile: (415) 956-100

Christopher A. Seeger (*pro hac vice*)  
*cseeger@seegerweiss.com*  
SEEGER WEISS, LLP  
55 Challenger Road, 6th Floor  
Ridgefield Park, NJ 07660  
Telephone: (973) 639-9100  
Facsimile: (973) 679-8656

Previn Warren (*pro hac vice*)  
*pwarren@motleyrice.com*  
MOTLEY RICE LLC  
401 9th Street NW, Suite 630  
Washington, DC 20004  
Telephone: (202) 386-9610  
Facsimile: (202) 232-5513  
*Plaintiffs' Co-Lead Counsel*

Jennie Lee Anderson (SBN 203586)  
*jennie@andrusanderson.com*  
ANDRUS ANDERSON LLP  
155 Montgomery Street, Suite 900  
San Francisco, CA 94104  
Telephone: (415) 986-1400  
Facsimile: (415) 986-1474  
*Plaintiffs' Liaison Counsel*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

\_\_\_\_\_  
This Document Relates to:  
*J.F. filed on behalf of minor L.F. v. Meta  
Platforms, Inc., et al., 4:23-cv-01846.*

**PLAINTIFFS' *EX PARTE* APPLICATION  
FOR APPOINTMENT OF GUARDIAN  
*AD LITEM***

## APPLICATION

Pursuant to this Court’s Order Regarding Appointment of Guardian *Ad Litem* (“Guardians *Ad Litem* Order”), Plaintiffs’ Liaison Counsel, Jennie Lee Anderson, hereby submits an *Ex Parte* Application for Appointment of Guardian *Ad Litem* (“*Ex Parte* Application”) for this Court’s consideration. ECF No. 122 at 3.

“Fit parents are presumed to act in the best interests of their children.” *J.B. by & Through Billiet v. Tuolumne Cnty. Superintendent of Sch.*, No. 19-cv-0858-NONE-EPG, 2021 WL 3115195, at \*2 (E.D. Cal. July 22, 2021) (citing *Troxel v. Granville*, 530 U.S. 57, 66 (2000); *Doe v. Heck*, 327 F.3d 492, 521 (7th Cir. 2003)); *see also Brown v. Alexander*, No. 13-cv-01451-RS, 2015 WL 7350183, at \*1 (N.D. Cal. Nov. 20, 2015) (“In general, a parent who is also a party to the lawsuit is presumed to be a suitable guardian ad litem, and so the court often appoints the parent as guardian ad litem upon receipt of an ex parte application without exercising much discretion.”) (citation omitted). Absent a conflict of interest, “[a] parent is generally appointed guardian *ad litem*.” *A.G. v. South Bay Dreams Coop., Inc.*, No. 16-cv-02598-RNB, 2018 WL 2002370, at \*3 (S.D. Cal. Apr. 30, 2018) (citing *Anthem Life Ins. Co. v. Olguin*, No. 06-cv-01165-AWI NEW (TAG), 2007 WL 1390672, at \*3 (E.D. Cal. May 9, 2007)); *accord J.M. v. Liberty Union High Sch. Dist.*, No. 16-cv-05225-LB, 2016 WL 4942999, at \*2 (N.D. Cal. Sept.16, 2016). However, “[w]hen there is a potential conflict between a perceived parental responsibility and an obligation to assist the court in achieving a just and speedy determination of the action, a court has the right to select a guardian ad litem who is not a parent if that guardian would best protect the child’s interests.” *J.M.*, 2016 WL 4942999, at \*1 (citations omitted) (internal quotation marks omitted).

Attached as Exhibit 1 to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ *Ex Parte* Application (“Anderson Decl.” or “Anderson Declaration”) is the *Ex Parte* Application for Appointment of Guardian *Ad Litem* (“Application”) submitted by the parents and/or legal guardians of individual minor Plaintiffs in the following cases:

- *J.F. filed on behalf of minor L.F. v. Meta Platforms, Inc., et al.*, 4:23-cv-01846 (Exhibit 1).

Exhibit 1 is the only Application submitted to Plaintiffs' Liaison Counsel for filing since the last guardian *ad litem* submission. The Application attached to the Anderson Declaration as Exhibit 1 is consistent with Attachment A to this Court's Guardian *Ad Litem* Order (ECF No. 122) and includes (1) the applicant's name and contact information (including address, email, and telephone number); (2) the name, case number, state of domicile (and its minimum age of capacity); (3) a sworn statement that the applicant is the parent and/or legal guardian of the minor plaintiff; and (4) a sworn statement affirming that the applicant is fully competent and qualified to understand and protect the rights of the minor plaintiff and has no interests adverse to the interests of that person. Anderson Decl. ¶ 4.

Pursuant to this Court's Guardians *Ad Litem* Order, the Applications by parents and/or legal guardians in the cases listed above are deemed presumptively approved upon filing, as there is no apparent conflict between the applicants' parental responsibility and their obligation to assist the Court in "achieving a just and speedy determination of the action." ECF No. 122 ¶ 4 (citing *J.M.*, 2016 WL 494299, at \*1). This Court also ordered that, absent the filing of an objection, the presumptive approval shall become final fifteen days after the date this *Ex Parte* Application is filed. ECF No. 122 ¶ 5. Therefore, the objection period will close on July 3, 2023.

Accordingly, Plaintiffs submit herewith a [Proposed] Order Granting *Ex Parte* Application and Appointing Guardian *Ad Litem* appointing the parent and/or legal guardian named in the Application submitted in the case listed above.

Dated: June 16, 2023

Respectfully submitted,

/s/ Jennie Lee Anderson

Jennie Lee Anderson (SBN 203586)

jennie@andrusanderson.com

**ANDRUS ANDERSON LLP**

155 Montgomery Street, Suite 900

San Francisco, CA 94104

Telephone: (415) 986-1400

Fax: (415) 986-1474

*Plaintiffs' Liaison Counsel*

Lexi J. Hazam (SBN 224457)

lhazam@lchb.com

**LIEFF CABRASER HEIMANN**

**& BERNSTEIN, LLP**  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Telephone: (415) 956-1000  
Facsimile: (415) 956-100

Christopher A. Seeger (*pro hac vice*)  
*cseeger@seegerweiss.com*  
**SEEGER WEISS, LLP**  
55 Challenger Road, 6th Floor  
Ridgefield Park, NJ 07660  
Telephone: (973) 639-9100  
Facsimile: (973) 679-8656

Previn Warren (*pro hac vice*)  
*pwarren@motleyrice.com*  
**MOTLEY RICE LLC**  
401 9th Street NW, Suite 630  
Washington, DC 20004  
Telephone: (202) 386-9610  
Facsimile: (202) 232-5513

*Plaintiffs' Co-Lead Counsel*

JOSEPH G. VANZANDT  
**BEASLEY ALLEN CROW METHVIN  
PORTIS & MILES, P.C.**  
234 COMMERCE STREET  
MONTGOMERY, AL 36103  
Telephone: 334-269-2343  
*joseph.vanzandt@beasleyallen.com*

EMILY C. JEFFCOTT  
**MORGAN & MORGAN**  
220 W. GARDEN STREET, 9TH FLOOR  
PENSACOLA, FL 32502  
Telephone: 850-316-9100  
*ejeffcott@forthepeople.com*

RON AUSTIN  
**RON AUSTIN LAW**  
400 Manhattan Blvd.  
Harvey LA, 70058  
Telephone: (504) 227-8100  
*raustin@ronaustinlaw.com*

MATTHEW BERGMAN  
GLENN DRAPER  
**SOCIAL MEDIA VICTIMS LAW CENTER**  
821 SECOND AVENUE, SUITE 2100  
SEATTLE, WA 98104

1 Telephone: 206-741-4862  
2 matt@socialmediavictims.org  
3 glenn@socialmediavictims.org

4 JAMES J. BILSBORROW  
5 **WEITZ & LUXENBERG, PC**  
6 700 BROADWAY  
7 NEW YORK, NY 10003  
8 Telephone: 212-558-5500  
9 Facsimile: 212-344-5461  
10 jbilborrow@weitzlux.com

11 PAIGE BOLDT  
12 **WATTS GUERRA LLP**  
13 4 Dominion Drive, Bldg. 3, Suite 100  
14 San Antonio, TX 78257  
15 T: 210-448-0500  
16 PBoldt@WattsGuerra.com

17 THOMAS P. CARTMELL  
18 **WAGSTAFF & CARTMELL LLP**  
19 4740 Grand Avenue, Suite 300  
20 Kansas City, MO 64112  
21 T: 816-701 1100  
22 tcartmell@wcllp.com

23 JAYNE CONROY  
24 **SIMMONS HANLY CONROY, LLC**  
25 112 MADISON AVE, 7TH FLOOR  
26 NEW YORK, NY 10016  
27 Telephone: 917-882-5522  
28 jconroy@simmonsfirm.com

CARRIE GOLDBERG  
**C.A. GOLDBERG, PLLC**  
16 Court St.  
Brooklyn, NY 11241  
T: (646) 666-8908  
carrie@cagoldberglaw.com

KIRK GOZA  
**GOZA & HONNOLD, LLC**  
9500 Nall Avenue, Suite 400  
Overland Park, KS 66207  
T: 913-451-3433  
kgoza@gohonlaw.com

SIN-TINY MARY LIU

**AYLSTOCK WITKIN KREIS & OVERHOLTZ,  
PLLC**

17 EAST MAIN STREET, SUITE 200  
PENSACOLA, FL 32502  
Telephone: 510-698-9566  
mliu@awkolaw.com

**ANDRE MURA  
GIBBS LAW GROUP, LLP**

1111 BROADWAY, SUITE 2100  
OAKLAND, CA 94607  
Telephone: 510-350-9717  
amm@classlawgroup.com

**EMMIE PAULOS  
LEVIN PAPANTONIO RAFFERTY**

316 SOUTH BAYLEN STREET, SUITE 600  
PENSACOLA, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

**ROLAND TELLIS  
DAVID FERNANDES  
BARON & BUDD, P.C.**

15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: (818) 839-2333  
Facsimile: (818) 986-9698  
rtellis@baronbudd.com  
dfernandes@baronbudd.com

**ALEXANDRA WALSH  
WALSH LAW**

1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
T: 202-780-3014  
awalsh@alexwalshlaw.com

**MICHAEL M. WEINKOWITZ  
LEVIN SEDRAN & BERMAN, LLP**

510 WALNUT STREET  
SUITE 500  
PHILADELPHIA, PA 19106  
Telephone: 215-592-1500  
mweinkowitz@lfsbalw.com

**DIANDRA "FU" DEBROSSE ZIMMERMANN  
DICELLO LEVITT**

1 505 20th St North  
2 Suite 1500  
3 Birmingham, Alabama 35203  
4 Telephone: 205.855.5700  
fu@dicellolevitt.com

5 ROBERT H. KLONOFF  
6 **ROBERT KLONOFF, LLC**  
7 2425 SW 76TH AVENUE  
8 PORTLAND, OR 97225  
9 Telephone: 503-702-0218  
klonoff@usa.net

10 HILLARY NAPPI  
11 **HACH & ROSE LLP**  
12 112 Madison Avenue, 10th Floor  
13 New York, New York 10016  
14 Tel: 212.213.8311  
hnappi@hrsclaw.com

15 JAMES MARSH  
16 **MARSH LAW FIRM PLLC**  
17 31 HUDSON YARDS, 11TH FLOOR  
18 NEW YORK, NY 10001-2170  
19 Telephone: 212-372-3030  
jamesmarsh@marshlaw.com

20 *Attorneys for Plaintiffs*